

FILED
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA v. SEAN WILLIAM STAFFORD Criminal No. GLR-12-0670

v.

SEAN WILLIAM STAFFORD,

Defendant

CLERK'S OFFICE
AT BALTIMORE

(Theft Within the Special Territorial
Jurisdiction of the United States; 18 U.S.C.
§ 661; Aiding and Abetting, 18 U.S.C. § 2)

INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges:

1. At all times material to this Indictment, Aberdeen Proving Ground was a military base owned and operated by the Department of the Army, a department of the United States, at Aberdeen, Maryland.

2. At all times material to this Indictment, the defendant **SEAN WILLIAM STAFFORD** was a civilian employee of a private construction company (the "Company"), which operated the Ricketts Point Road Construction Site, located within the Aberdeen Proving Ground military base. At all times material to this Indictment, **SEAN WILLIAM STAFFORD** was assigned to the Ricketts Point Road Construction Site.

3. At all times material to this Indictment, the Company stored brass hose valves in a storage container on the Aberdeen Proving Ground. Certain employees of the Company had access to this storage container, including **SEAN WILLIAM STAFFORD**.

4. On or about September 5, 2012, in the District of Maryland and the special territorial jurisdiction of the United States, the defendant,

SEAN WILLIAM STAFFORD,

willfully and knowingly did take and carry away, with the intent to steal and purloin, the personal property of another, to wit: brass hose valves, having a value in excess of \$1,000.

18 U.S.C. § 641
18 U.S.C. § 7(3)
18 U.S.C. § 2

COUNT TWO

The Grand Jury for the District of Maryland further charges:


5. The allegations of Paragraphs 1-3 are incorporated by reference as though fully set forth.

6. On or about September 6, 2012, in the District of Maryland and the special territorial jurisdiction of the United States, the defendant,

SEAN WILLIAM STAFFORD,

willfully and knowingly did take and carry away, with the intent to steal and purloin, the personal property of another, to wit: brass hose valves, having a value in excess of \$1,000.

18 U.S.C. § 641
18 U.S.C. § 7(3)
18 U.S.C. § 2


Rod J. Rosenstein
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

Date: 12/20/2012